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April 21, 2022

VIA ECF

Judge LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

Re: Zapata Osorio, et al. v. Vector Structural Preservation Corp., et al.
Case No.: 19 CV 4896 (LDH)

Dear Judge Hall:

We represent Defendants Vector Structural Preservation Corp. and Vassilios Handakas ("Defendants") in the above matter. This shall serve as Defendants' request for adjournment of the upcoming deadline for Defendants to file their pre-summary judgment letter and 56.1 statement.

Defendants' pre-summary judgment letter and 56.1 statement are currently due on April 26, 2022. Defendants request an adjournment because the undersigned needs additional time to confer with Defendants about their declarations in support of the pre-summary judgment letter and 56.1 statement. Additionally, the undersigned currently has a very busy calendar and needs additional time to draft Defendants' papers. Further, counsel for Plaintiffs will be on trial beginning on May 16, 2022. The current deadline for Plaintiffs' responsive papers is May 17, 2022, and counsel for Plaintiffs has indicated that she would like the opportunity to file her opposition papers at some time that is not during that trial.

This is the first request for adjournment. Counsel for Plaintiffs consents to this request.

An adjournment or extension of time would affect other scheduled dates. Defendants, with the consent of Plaintiffs, propose that Defendants' pre-summary judgment letter and 56.1 statement be due on May 10, 2022, that Plaintiffs' responsive papers be due on May 31, 2022, and that Defendants' reply

papers be due on June 15, 2022. Defendants and Plaintiffs additionally propose that the pre-motion conference, if any, be held on any date after June 15, 2022 that is convenient for the Court.

We thank the court for its consideration herein.

Very truly yours,

A handwritten signature in black ink, appearing to be 'M. Rabinowitz', written over the closing 'yours,'.

Michael M. Rabinowitz

Cc: Counsel for Plaintiff VIA ECF